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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

STEVEN JONES

Debtor

:
:
: Case No. 13-30816
:
: Chapter 13
:
: Hearing Date: January 23, 2019
:
: Judge: Hon. Kathryn C. Ferguson

COUNSEL'S LIMITED OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Michael M. Khalil, counsel to the Debtor, submits the following limited objection to the Trustee's Motion to Dismiss:

1. I am attorney at law of the State of New Jersey, this District, an associate of the above law firm and have been tasked with the representation of the Debtor in this matter.
2. The Debtor is in receipt of the Trustee's Motion to Dismiss (Docket # 132) and the supplement in support of the same (Docket # 134).
3. The objection herein is limited and being made only to the proposed distribution as outlined in the Trustee's supplement.
4. Debtor would like to advise the Court that a supplemental fee application has been filed (Docket # 135) and that all distributions by the Trustee should be stayed pending the outcome of this application. Should the same be granted, it is respectfully submitted that the fees stemming from that application take a priority over all other creditors as per the hierarchy in the Debtor's confirmed chapter 13 plan and that the same should be satisfied first before any other distributions are made.

WHEREFORE, the Debtor respectfully requests that the Court deny the relief requested in the Trustee's Motion as to distribution of funds on hand and that the Order dismissing the case compel distribution consistent with the above.

Dated: January 16, 2019

/s/ Michael M. Khalil.
Michael M. Khalil, Esq.
Attorney for Debtor